

## **IFWG WORK GROUP RESPONSES TO STAKEHOLDER COMMENTS**

### **Cross-cutting issues**

#### *Task Implementation and Public Process*

- 1) Balanced stakeholder input is important. Work group leads will recruit additional participation and take careful account of unrepresented or under-represented stakeholders (timber industry, biomass utilization interests, local environmental groups, etc.)
- 2) Given limited resources and the need for an efficient public participation process, agency staff will take the lead in developing plans and products and will then solicit input through meetings, workshops and email.
- 3) CAL FIRE and CEC will develop a synthesis of the latest scientific information on wildfire, fuels management and biomass utilization effects, including recent symposia and literature reviews in progress, to address technical comments relevant to IFWG goals and objectives.

#### *Timing and Coordination*

- 4) Tasks 2 and 3 will continue to move forward.
  - It is not necessary to wait for “completion” of Task 1 (Inventory improvement) before implementing other tasks. Inventory improvement will be an ongoing process, and IFWG participants will be providing input to ARB on this task. Potential revisions to carbon pool categories, inventory methodology and GHG estimates need not delay the examination of current programs and regulations, the development of a definition for sustainable biomass utilization and AB 118 grant program implementation, or the examination of incentives for increasing sequestration and reducing emissions.
  - Work Groups will not wait for additional symposia on fire, fuels management, and biomass before proceeding.
  - Policy issues, such as the relationship of inventory categories to policy and program accountability (ie imported wood emissions, energy sector credit for forest biomass energy), will be addressed on a parallel track by IFWG.
- 5) Task 2 will review opportunities to improve program reporting and monitoring practices which can be considered by ARB for Task 1 inventory improvement.
- 6) Task 3 will be coordinated with Task 2 to avoid duplication and improve efficiency of the IFWG process. Task 2, step 3 (review of regulations and programs) is intended primarily to address net GHG sequestration, but it can be used to flag those programs or rules that relate to sustainable forest biomass

utilization for energy. Task 2 can be expanded, if needed, to address Task 3, Step 3 (regulatory review of sustainability).

7) The remainder of Task 2 and 3 deliverables will be kept separate. Recommendations for additional policies or practices for ensuring that programs and laws addressing timber harvest, land conversion, reforestation, etc. maintain current carbon benefits will be addressed separately from any recommendations related to definitions for developing sustainable forest biomass operations.

8) Task 2 will consider how to assess opportunities for improving sequestration, given time and resource constraints. This includes analyses done for CAL FIRE's draft 2010 Forest and Rangeland Assessment. We agree that this could provide useful information for Task 4.

#### **Additional Issues for Task 2:**

9) To address concerns about improving GHG estimates before moving forward, the Task 2 work group will review forest carbon sequestration estimates developed for CAL FIRE's draft 2010 Forest and Rangeland Assessment that are based on updated FIA data.

10) In response to IFWG requests to focus on regulations/programs that address significant risks to carbon and to address specific stakeholder concerns about harvesting, wildfire and conversion, Task 2 work group will review analyses of risks to carbon developed for CAL FIRE's draft 2010 Forest and Rangeland Assessment.

11) In response to comments about the effects of other sectors and of interstate or international markets on forest management for wood products and biomass, we will incorporate discussion of markets, infrastructure and investment barriers and opportunities into our review of program and regulatory needs.

12) Preliminary Task 2 timeline:

- Two to four workshops by fall 2010.
- Development of findings and recommendations re: capacity to ensure 2020 target by end of 2010
- If additional modeling and analysis is desired and resources are available, deliverables may extend into 2011.

#### **Additional Issues for Task 3:**

13) CEC will move forward with Task 3, but will work with CAL FIRE to develop a review of past and current science on wildfire trends and effects, fuel management effects, and biomass utilization effects.

- CEC can move forward with setting up the working group, field trips, workshops and other task activities investigating the practice and economics of biomass operations while developing this additional science review.
- Past and current research, including papers presented at the recent Pre- and Post-Fire Management symposium, indicate that hazards, wildfire intensity and burned acres are increasing and that fuels management can reduce those impacts.

14) Task 3 will initially focus at the project or watershed level, and will address landscape level sustainability over the longer term in collaboration with CAL FIRE and USFS. This evaluation will require full GHG life cycle analysis of all project co-products and fuels produced.

15) Activity order within the Work Plan is not intended to imply a strict sequence.

- CEC's implementation of AB 118 provides support for a wide variety of pre-commercial project development, including activities such as feasibility studies, feedstock sourcing and lab testing, site analysis, and others that occur far in advance of funding an actual processing facility. The findings from such activities provide invaluable data on potential sustainability impacts occurring within the scope of a project.
- In the project evaluation process, due diligence will be required of project developers in matching sustainable feedstock supply to conversion capacities.
- Activity 9 is meant to provide support for integrated pilot project case studies, in which the prototyping of plant operations is integrated with scientific monitoring and analysis of harvest site impacts to more fully understand project footprints, and to adapt project design to address problems.
- The research agenda under Activity 7 is evolving in response to emerging questions from the Forest Service Fire Conference, the Pinchot-Heinz Symposium, and other forums.